

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: SOLUTIA, INC.
FACILITY NAME: SOLUTIA, INC.
LOCATION: ANNISTON, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
301-0007-X023	75 MMBtu/hr Natural Gas and Used Oil Fired Process Steam Boiler

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: Draft

Solutia Inc.
ANNISTON, ALABAMA
(PERMIT NO. 301-0007-X023)
PROVISOS

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the even additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than **1 hour**, the intent to shut down shall be reported to the Air Division at least 24 hours prior to the planned shutdown, **unless accompanied by the immediate shutdown of the emission source.**
7. In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than **1 hour**, the person responsible for such equipment shall notify the Air Division within an additional 24 hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Air Division shall be notified when the breakdown has been corrected.
8. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
9. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.

10. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.
11. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
12. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
13. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
14. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air

Division.

15. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
16. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
17. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.
18. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
19. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.
20. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
21. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
22. In accordance with the requirements of ADEM Admin. Code r. 335-3-4-.03, the particulate matter (PM) emissions from the boiler shall be limited to the emission rate calculated by the following equation:

$$E = 1.38H^{-0.44}$$

Where,

E = Emissions in lb/million Btu

H = Heat Input in millions of Btu/hr

23. In accordance with the requirements of ADEM Admin. Code r. 335-3-5-.01, the sulfur dioxide (SO₂) emissions from this source shall not exceed 1.8 lb/MMBtu
24. The following operational parameters will be monitored and recorded continuously. Continuous monitoring shall be defined as: data points taken at intervals of one (1) minute, averaged over a fifteen (15) minute period.
 - (a) O₂ levels in the exhaust gas;
 - (b) Temperature of the exhaust gas; and
 - (c) By-product fuel firing rate.
25. An alarm shall be installed and maintained which will automatically sound whenever the O₂ content of the boiler exhaust falls below 5 percent. An automatic shut-off device will be installed and maintained so that firing of used oil in the boiler shall automatically cease whenever one of the following parameters is exceeded over the fifteen minute rolling average:
 - (a) The exhaust O₂ level falls below 3.0 percent;
 - (b) The temperature of the exhaust gas leaving the boiler falls below 225 °F.

Continuous monitoring results shall be recorded in a manner suitable for inspection. These records shall be maintained for a period of at least three (3) years.
26. The used oil fired in this unit shall not be used during periods of start-up, shutdown, unstable boiler conditions, and such periods indicated by the failure to meet the requirements in Proviso No. 23.
27. The used oil fired in this unit shall not be used during periods when the continuous monitoring equipment in Proviso No. 23 is not in proper working order.
28. The maximum sulfur content of the used oils fired in this unit shall not exceed 0.5 percent by weight.
29. In order to remain below the level considered hazardous waste, the used oil fired in this source shall have a maximum halogen content less than 1,000 ppm.
30. In order to remain classified as a synthetic minor source, the used oils fired in this source shall be limited to 2,000,000 gallons based on a 12-month rolling average.
31. This source shall comply with the applicable requirements of 40 CFR 279.72, 279.73, and 279.74(b) for the used oil fired in this unit which meets the requirements of Table 1 of 40 CFR 279.11 ("on-specification used oil").

32. This source shall comply with the requirements of 40 CFR Part 279, Subpart G for the used oil fired in this unit which does not meet the requirements of Table 1 of 40 CFR 279.11 (“off-specification used oil”).
33. As stated in 40 CFR 279.61(b)(2), off-specification used oil may be mixed with virgin oil or on-specification used oil for purposes of burning, but may not aggregate for purposes of producing on-specification used oil. Records shall be kept of the amount of the off-specification used oil mixed with on-specification used oil. These records shall be maintained and readily available for inspection for a period of two (2) years.
34. As indicated in Table 2 of 40 CFR Part 63, Subpart JJJJJ, a tune-up of the boiler shall be conducted every five (5) years as specified in 40 CFR 63.11223.
35. As indicated in 40 CFR 63.11225(b), a compliance report containing the information listed in 40 CFR 63.11225(b)(1) through (4) shall be submitted by March 15 of the calendar year following completion of the tune-up on the boiler.
36. This source shall keep the records as listed in 40 CFR 63.11225(c)(1) through (7) as applicable. These records shall be maintained in a form suitable for inspection for a period of five (5) years as indicated in 40 CFR 63.11225(d).
37. Records of the amount of used oils fired in the boiler on a 12 month rolling total basis shall be maintained and readily available for inspection for a period of five (5) years.

Draft

Date